



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

August 10, 2018

VIA ECF

Chief Judge Colleen McMahon
United States District Court
500 Pearl Street
New York, NY 10007

Re: United States v. Ramon Paulino (18 Cr. 489 (CM))

Dear Judge McMahon:

We write to update the Court regarding disclosure of certain medical and psychiatric records of the victim in this case.

As we informed the Court by letter last week, on August 3, 2018, the Government produced 892 pages of medical records documenting the life-threatening injuries the victim suffered, and the medical care he received as a result of those injuries. Approximately 20 of those pages included psychiatric notes, some of which contain highly sensitive personal information regarding the victim and his mother; those approximately 20 pages were produced to defense counsel with significant redactions.

Upon further review, we believe that certain additional portions of those approximately 20 pages are appropriate for disclosure at this point, but that other portions of those pages are not appropriate for disclosure, at least at this time. The approximately 20 pages in question are contained within nine separate medical reports that form a small part of the victim's entire medical record; for ease of reference, we are including the entirety of those nine reports with this letter. (Because the reports are included in their entirety, they total more than 20 pages). (*See* Attachments A-I).

Accordingly, the Government proposes disclosing to defense counsel redacted versions of certain pages of the victim's medical records, attached herein. The statements in the reports that the Government believes should remain redacted (which are highlighted in the attached reports) relate principally to:

- [REDACTED]

[REDACTED]

[REDACTED]


- [REDACTED]
- [REDACTED]

We respectfully request that the Court authorize the Government's proposed disclosure given the significant privacy interests at stake.

The Government will ECF-file a redacted version of this letter which will not contain the factual details set forth in the three bulleted paragraphs above, or any of the attached medical records. The Government notes that these disclosures will be subject to the protective provisions set forth in an agreement between the Government and defense counsel that is awaiting signature by the defendant prior to submission to the Court for entry as a protective order.

Respectfully submitted,

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